

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

<p>KIRA WAHLSTROM, Plaintiff, -against- DAVID J. HOEY, LAW OFFICES OF DAVID J. HOEY, P.C., DON C. KEENAN, D.C. KEENAN & ASSOCIATES, P.C. D/B/A THE KEENAN LAW FIRM, P.C., AND KEENAN'S KIDS FOUNDATION, INC. Defendants</p>	<p>Civil Case No. 1:22-cv-10792-RGS</p>
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**PLAINTIFF'S ASSENTED TO MOTION TO EXTEND
SETTLEMENT ORDER OF DISMISSAL DEADLINE**

Plaintiff Kira Wahlstrom with the assent of Defendants David J. Hoey, Law Offices of David J. Hoey, P.C., Don C. Keenan, and D.C. Keenan and Associates P.C. d/b/a The Keenan Law Firm P.C. moves to extend the deadline to file a motion to reopen this action set by the Court's Settlement Order of Dismissal (Dkt. No. 128) on the following grounds:

1. Undersigned counsel conferred with counsel for the Hoey Defendants and the Keenan Defendants who assent to this motion.
2. The parties participated in mediation and this case was reported settled on December 14, 2023. (Dkt. No. 127)
3. On December 15, 2023, this Court issued a Settlement Order of Dismissal (Dkt. No. 128) which ordered:

It is ORDERED that this action is hereby dismissed, without costs and without prejudice to the right of any party, upon good cause shown, to reopen the action within (60) days if settlement is not consummated.

4. A formal settlement agreement among the parties has now been signed¹ but an additional 30 days is needed to consummate the confidential terms and file the stipulation of dismissal with prejudice.
5. Thus, Plaintiff moves for a 30-day extension of time in which a party may move to reopen this action upon good cause shown set by the Court's Settlement Order of Dismissal in case of complications or problems arising concerning consummating the settlement that require such a motion be filed (though at this time the parties anticipate the terms to be fully met during the extended time period).

February 12, 2024

Respectfully submitted,

On behalf of Plaintiff
Kira Wahlstrom

/s/ Bridget A. Zerner
Bridget A. Zerner, BBO #669468
John J.E. Markham, II, BBO #638579
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CERTIFICATE OF SERVICE

I hereby certify that on February 12, 2024 this document was served by electronic delivery through the CM/ECF system on the registered participants as identified on the Notice of Electronic Filing, which will forward copies to Counsel of Record.

/s/ Bridget A. Zerner
Bridget A. Zerner

¹ As of this filing, two signatures have not yet been received but counsel has represented they will soon be delivered.